

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAURA MARTIN,)
Plaintiff,)
v.)
RAHM EMANUEL, in his official capacity as) No. 19-cv-1708
Mayor of the City of Chicago; the CITY OF) Judge Robert W. Gettleman
CHICAGO, an Illinois Municipal Corporation;) Magistrate Judge Shelia Finnegan
LISA MORRISON BUTLER, in her official)
capacity as Commissioner of the Chicago)
Department of Family and Support Services; and)
CHICAGO DEPARTMENT OF FAMILY AND)
SUPPORT SERVICES,)
Defendants.)

OFFER OF JUDGMENT

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendant City of Chicago (the “Defendant”), by its attorney Mark A. Flessner, Corporation Counsel for the City of Chicago, makes the following offer of judgment to Plaintiff Laura Martin:

1. Defendant hereby offers to allow judgment to taken against it by Plaintiff in the amount of TWENTY FIVE THOUSAND ONE AND 0/100 DOLLARS (\$25,001.00), plus reasonable costs and attorney's fees accrued as of the date of this offer, October 7, 2019, as determined by the Court.

2. This offer of judgment is inclusive of all claims Plaintiff has or may have against the Defendant and any other current or former employees, agents, or departments of the City of Chicago, including but not limited to Rahm Emanuel, Lisa Morrison Butler, and Chicago Department of Family and Support Services, arising from the incidents and occurrences alleged in Plaintiff's Complaint.

3. This offer of judgment is made for the purposes specified in Rule 68, and shall not

be construed as either an admission that the Defendant is liable in this action, or that Plaintiff has suffered any damages.

4. Pursuant to Rule 68, an offer not accepted within fourteen (14) days after service of the offer shall be deemed withdrawn and evidence thereof is not admissible except in a proceeding to determine costs.

Date: October 7, 2019

Respectfully submitted,
MARK A. FLESSNER,
Corporation Counsel of the City of Chicago
By: /s/ Peter H. Cavanaugh
Assistant Corporation Counsel

Andrew S. Mine
Peter H. Cavanaugh
City of Chicago, Department of Law
Constitutional and Commercial Litigation Division
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Attorneys for City Defendants

CERTIFICATE OF SERVICE

I, Peter H. Cavanaugh, hereby certify that on October 7, 2019, I caused the foregoing *Offer of Judgment* to be served via hand delivery on the following before 5 p.m. C.D.T.:

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/s/ Peter H. Cavanaugh
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